

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: : CASE NO: 18-11517
Delmin A. Then :
Debtor(s) : CHAPTER 13

**RESPONSE TO MOTION OF WELLS FARGO BANK, N.A. FOR RELIEF FROM THE
AUTOMATIC STAY UNDER SECTION 362 (d) AND MOTION FOR SANCTIONS IN THE
FORM OF IN REM RELIEF**

1. Admitted
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Admitted.
7. Denied.
8. Denied.
9. Denied.
10. Denied.
11. Denied.
12. Denied.
13. Denied.
14. Denied.
15. Denied.
16. Denied.

WHEREFORE, Debtor seeks an Order denying this Motion.

Respectfully submitted,

Dated: April 18, 2018

By: /s/ Michael D. Hess
Michael D. Hess, Esquire
Pa. I.D.# 63650
Attorney for Debtor
1672 Manheim Pike
Lancaster, PA 17601
(717) 391-2911